

**INITIAL STATEMENT OF REASONS
FOR
PROPOSED BUILDING STANDARDS
OF THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
REGARDING THE AMENDMENT OF THE 2013 CALIFORNIA BUILDING CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2, CHAPTER 11A “HOUSING ACCESSIBILITY”
(HCD 04/13)**

The Administrative Procedure Act (APA) requires an Initial Statement of Reasons to be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE AND BENEFITS:

(Government Code Section 11346.2(b)(1) requires a statement of specific purpose of each adoption, amendment or repeal, the problem the agency intends to address and the rationale for the determination by the agency that each adoption, amendment or repeal is reasonably necessary to carry out the purpose, including the problem the agency intends to address, for which it is proposed. The statement shall enumerate the benefits anticipated from the regulatory action, including the benefits or goals provided in the authorizing statute.)

1) The Public Problem, Administrative Requirement, or Other Circumstance Addressed.

Administrative Requirement: Health and Safety Code Sections 17921, 17922 and 19990 directs the Department of Housing and Community Development (HCD) to propose adoption, amendment or repeal of building standards for the protection of public health, safety and general welfare. Government Code Section 12955.1 provides direction for HCD to propose adoption of building standards necessary to prohibit discrimination in the design and construction of all housing other than publicly funded housing.

2) Specific Purpose

HCD has determined the amendment of the 2013 edition of the California Building Code is needed pursuant to the requirements of Health and Safety Code Section 17921 and Government Code Section 12955.1.

The specific purpose of these regulations is to amend the 2013 California Building Code, Title 24, Part 2, Chapter 11A, of the California Code of Regulations (CCR) for the following programs:

- a) **State Housing Law:** 1. relative to residential occupancies, buildings or structures accessory thereto and as provided in Health and Safety Code Section 17921; 2. relative to California Fair Employment and Housing accessibility requirements as provided in Government Code Section 12955.1, except where the application is for public use only.
- b) **Employee Housing Act:** relative to any building or structure or outdoors on premises or property in accordance with Health and Safety Code Section 17040.
- c) **Mobilehome Parks or Special Occupancy Parks:** relative to the use of building systems in or on any permanent buildings, accessory buildings, and structures under the ownership and control of the park operator within the park in accordance with Health and Safety Code Section 18300 for mobilehome parks, and Sections 18865 and 18873 for special occupancy parks.
- d) **Factory-Built Housing Law:** relative to residential buildings, dwellings or portions thereof, or building components, or manufactured assemblies in accordance with Health and Safety Code Section 19990.

3) Rationale for Necessity

The 2013 California Building Code (CBC) becomes effective on January 1, 2014. HCD has developed amendments to the 2013 CBC, Chapter 11A, to implement, interpret and make specific provisions of state and federal law, including the alignment, where possible, of technical requirements with Chapter 11B (Division of the State Architect – Access Compliance) regarding public use areas and common use areas.

The proposed changes to the 2013 CBC, Chapter 11A, are necessary to provide clarity and consistency for enforcement and application with regard to statewide needs and to address conditions unique to California.

Specific Proposed Regulatory Action: HCD proposes to amend the 2013 California Building Code, Chapter 11A. The rationale for each amendment is listed below.

CHAPTER 11A HOUSING ACCESSIBILITY

1. NOTE 1

SECTION 1101A APPLICATION

NOTE 1:

Rationale: HCD proposes to add Note 1 directly below the “Chapter 11A Housing Accessibility” heading to clarify that compliance with additional accessibility requirements under more than one jurisdiction or law may be required, and to advise that where federal, state, or local laws differ, the more stringent requirements apply. For more details, users are directed to the Joint Statement of the Department of Housing and Urban Development and the Department of Justice issued on April 30, 2013, available at www.hud.gov.

The note serves as an alert that covered multifamily dwellings may be subject to accessibility requirements other than Chapter 11A (such as, Section 504 of the Rehabilitation Act, the 2010 ADA Standards, the Architectural Barriers Act, and/or Title 24, Part 2, Chapter 11B); therefore, it is important to be aware that compliance with each jurisdiction or law is required.

Section: 1101A.1 Scope.

Rationale: HCD proposes to amend the above referenced section. Section 1101A.1 currently provides a reference to Section 1.9.1.1 and the provisions of the Division of the State Architect (DSA) for public accommodations, public use areas and public housing. However, the existing language does not refer directly to Chapter 11B, which contains the technical provisions. The existing language also does not provide a correct reference to Chapter 1. Section 1.9.1.1, as currently referred, addresses publicly funded buildings only; public accommodations are addressed in Section 1.9.1.2. The proposed language, including the editorial modifications, is intended to clarify the application.

HCD also proposes new language clarifying that newly constructed covered multifamily dwellings, which can also be defined as public housing, may be subject to the requirements of both Chapter 11A and Chapter 11B. This modification is a result of stakeholder comments expressing a concern that the language in Section 1101A.1 may be interpreted wrongly, requiring all types of public housing, including covered multifamily dwellings, to comply with Chapter 11B only.

In addition, HCD proposes to amend Item 2 and Item 4 clarifying that Chapter 11A applies to new common use areas serving new and existing covered multifamily dwellings. HCD proposes to add “new” to Item 4, and replace “spaces” with “areas” in Item 2 (“common use areas” is a term defined in Chapter 2 and adopted by HCD; the definition clarifies that common use area includes spaces).

Currently Item 2 addresses new common use spaces serving existing covered multifamily dwellings, while Item 4 addresses common use areas serving covered multifamily dwellings. The proposal for clarifying the language is a result of comments received from stakeholders. Many stakeholders expressed concerns that the different terms used in Item 2 and Item 4 (common use spaces and common use areas) create confusion, and that Item 4 lacks clarity whether Chapter 11A is applicable to new or existing common use areas. Item 4 was added in 2006, when Chapter 11A was reorganized with the intent to provide clarity by addressing new common use areas serving new covered multifamily dwellings.

The proposed amendment provides further clarity to the code user. There is no intended change in regulatory effect.

Section: 1102A.4 (Formerly Section 1102A.5) Temporary restrictions.

Rationale: HCD proposes to renumber Section 1102A.5 to Section 1102A.4. Renumbering is necessary due to the proposal to repeal Section 1102A.4 “Swimming pools”.

**3. SECTION 1103A
DESIGN AND CONSTRUCTION**

Section: 1103A.1 General.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to add a reference to Chapter 11B, and to repeal “Section 1103A.1.1” because it does not have a title and there is no benefit for it to continue to be maintained.

Section 1103A.1 (Note) currently provides a reference to Section 1.9.1.1 and the provisions of the Division of the State Architect (DSA) for public accommodations, public use areas and public housing. The same language is repeated in three other sections of Chapter 11A. Instead of repeatedly referring code users to Chapter 11B for public accommodations, public use areas and public housing, HCD proposes to eliminate all references, except in Section 1101A.1 “Scope and application” and Section 1102A “Building accessibility”, which provide a general reference to Chapter 11B for buildings and applications not covered by Chapter 11A. HCD also proposes to clarify in Sections 1101A and 1102A that newly constructed covered multifamily dwellings, which can also be defined as public housing, may be subject to the requirements of both Chapter 11A and Chapter 11B.

The proposed amendment is a result of comments received from stakeholders. Many stakeholders expressed a concern that repealing the same language in multiple sections causes many code users to believe that if the reference is not provided for particular buildings, areas and/or facilities, these buildings, areas and/or facilities do not need to comply with Chapter 11B regardless of whether or not they contain public accommodations, public use areas and public housing.

The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

**4. SECTION 1108A
GENERAL REQUIREMENTS FOR ACCESSIBLE PARKING AND EXTERIOR ROUTES OF TRAVEL**

Rationale: HCD proposes to amend the above referenced section. Note 2 currently provides a reference to Section 1.9.1.1 and the provisions of the Division of the State Architect (DSA) for public accommodations, public use areas and public housing. The same language is repeated in three other sections of Chapter 11A. Instead of repeatedly referring code users to Chapter 11B for public accommodations, public use areas and public housing, HCD proposes to eliminate all references, except in Sections 1101A.1 “Scope and application” and Section 1102A “Building accessibility”, which provide a general reference to Chapter 11B for buildings and applications not covered by Chapter 11A. HCD also proposes to clarify in Sections 1101A and 1102A that newly constructed covered multifamily dwellings, which can also be defined as public housing, may be subject to the requirements of both Chapter 11A and Chapter 11B.

The proposed amendment is a result of comments received from stakeholders. Many stakeholders expressed a concern that repealing the same language in multiple sections causes many code users to believe that if the reference is not provided for particular buildings, areas and/or facilities, these buildings, areas and/or facilities do not need to comply with Chapter 11B regardless of whether or not they contain public accommodations, public use areas and public housing.

HCD also proposes to amend the Table of Contents to incorporate the new titles proposed for Sections 1110A and 1113A.

The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

5. SECTION 1109A PARKING FACILITIES

Section: 1109A.2 Parking facilities. (No change to text)

Section: 1109A.2.1 Private garages.

Rationale: HCD proposes to amend Section 1109A.2.1. The proposed amendment is a result of comments received from stakeholders seeking interpretation of the applicability of Section 1109A.2.1 (Exception) to residential private garages.

The language in Section 1109A.2.1 was modified during the 2007 Annual Code Adoption Cycle. More language was added to the exception to provide more details and clarity. However, it seems that some important details were misinterpreted by some code users

The proposed modification is intended to clarify that the exception applies only to private garages attached to and directly serving single covered multifamily dwelling units, and not garages attached to common use areas (such as corridors) , as previously interpreted by some design professionals and enforcing agencies. There is no intended change in regulatory effect.

Section: 1109A.8 Design and construction. (No change to text)

Section: 1109A.8.1 Vertical clearance.

Rationale: HCD proposes to amend Section 1109A.8.1. HCD proposes to replace the reference to Chapter 11B with a reference to Section 1143A, which contains the same requirements.

Currently Section 1109A.8.1 refers to Chapter 11B as an appropriate place containing the requirements for reflective warning signs. However, during the 2012 Triennial Code Adoption Cycle, Section 1143A was modified for consistency with Chapter 11B. As a result, there is no longer a reason for Chapter 11B to be referenced when the same requirements for character height are contained in Section 1143A. The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1109A.8.5 Accessible single parking space.

Rationale: HCD proposes to amend the above referenced section, incorporating language from the 2010 ADA and Chapter 11B. HCD intends to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible. Editorial modifications are also proposed for clarity. The reference to Figures 11A-2A and 11A-2C is proposed for repeal because the Note at the end of this section provides a reference to Figures 11A-2A, 11A-2B and 11A-2C.

The process of incorporating ADA language into Chapter 11A began during the 2012 Triennial Code Adoption Cycle. During the current intervening code adoption cycle, HCD continues to modify sections that were left untouched during the previous rulemaking. The proposed amendment is consistent with Section 11B-502.3.4. The only regulatory change from the existing Chapter 11A language is the allowance of access aisles to be located on either side of the vehicle.

The allowance of access aisles to be located on either side of the vehicle, which originates from the 2010 ADA and ANSI A117.1, was proposed by the DSA during the previous triennial code adoption cycle, discussed, and approved by the California Building Standards Commission with no opposition. The end-users, including people with disabilities, had sufficient opportunity to discuss the practicality of this change and provide input. HCD does not believe there is any reason to maintain different requirements in common use parking areas.

Section: 1109A.8.6 Van accessible parking space.

Rationale: HCD proposes to amend the above referenced section incorporating language from the 2010 ADA and Chapter 11B. HCD intends to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible. Editorial modifications are also proposed for clarity.

The process of incorporating ADA language into Chapter 11A began during the 2012 Triennial Code Adoption Cycle. During current intervening code adoption cycle, HCD continues to modify sections that were left untouched during the previous rulemaking. The proposed amendment provides clarity and consistency with Section 11B-502.2. Section 11B-502.2 was proposed by the DSA during the previous triennial code adoption cycle, discussed, and approved by the California Building Standards Commission. The end-users, including people with disabilities, had sufficient opportunity to discuss the practicality of this change and provide input. There is no intended change in regulatory effect.

Section: 1109A.8.8 Identification. (Formerly “Parking signage”)

Section: 1109A.8.8.1 Parking signage.

Section: 1109A.8.8.2 Parking space marking.

Rationale: HCD proposes to amend the above referenced sections. The new amendment incorporates language from the 2010 ADA and Chapter 11B. HCD intends to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible.

The existing Section 1109A.8.8 is reformatted to clearly describe the specific requirements for parking signage and parking space marking, merging the existing and the proposed language. The existing Note is proposed for repeal because this issue is already addressed in Section 1109A.4. Additional editorial modifications are also proposed for clarity.

The process of incorporating ADA language into Chapter 11A began during the 2012 Triennial Code Adoption Cycle. During this intervening code adoption cycle, HCD continues to modify sections that were left untouched during the previous rulemaking. The proposed amendments provide clarity and consistency with Chapter 11B, the 2010 ADA and 2009 ANSI A117.1.

**6. SECTION 1110A
EXTERIOR ACCESSIBLE ROUTES (FORMERLY EXTERIOR ROUTES OF TRAVEL)**

Section: 1110A.1 General. (Formerly “Exterior accessible route”)

Rationale: HCD proposes to amend the above referenced section. HCD proposes to change the title of Section 1110A, replacing “Exterior routes of travel” with ‘Exterior accessible routes.” HCD intends to provide more clarity since Section 1110A contains requirements for exterior accessible routes, not exterior routes of travel. In addition, some stakeholders expressed a concern that “Exterior routes of travel” is not defined in Chapter 11A, and as used here and in other sections of Chapter 11A, creates confusion. HCD also proposes to change the title of Section 1110A.1 for consistency with Chapter 11B and Section 1119A.

HCD proposes to repeal Item 1 and amend Item 2 by adding the same language currently in Item 1. This amendment, if adopted, will require all routes of travel from site arrival points to the accessible building entrance they serve to be accessible. This amendment is consistent with Section 11B-206.2.1, and provides more clarity to the code user.

HCD proposes to modify the Note, adding site arrival points to the text. This amendment is a result of comments received from stakeholders expressing concerns that while Chapter 11A, which allows vehicular access in lieu of accessible pedestrian routes to common use areas on a steep site, does not expressly address the issue with respect to the required accessible pedestrian route from the public way. The modification of this Note is consistent with Chapter 11B, FHA Guidelines and ANSI A117.1.

Rationale: HCD proposes to amend the above referenced section. Currently Section 1110A.2 provides a reference to Section 1143A.2 for directional signs. However, Section 1143A was modified during the 2012 Triennial Code Adoption Cycle, and Section 1143A.2 no longer contains the requirements for directional signs. HCD proposes to correct this oversight, providing a reference to Section 1143A. HCD believes that a reference to “general” sections is a preferable method, since references to specific sections often require repeated adjustments due to reformatting and renumbering of subsections. The proposed amendment provides clarity. There is no intended change in regulatory effect.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to modify the title, replacing “Flooring” with “Floor and ground surfaces.” This amendment is a result of comments from stakeholders. The term “Surfaces” more accurately describes the intent of this section. Since Section 1110A provides measures for exterior accessible routes, the term “Flooring” creates confusion. This modification also provides consistency with the terminology used in Chapter 11B. There is no intended change in regulatory effect.

Rationale: HCD proposes to renumber and amend Section 1113A.6 to Section 1113A.5. HCD proposes to add language clarifying the placement of elongated openings. The proposed amendment provides clarity and consistency with Section 11B-302.3 and Section 1138A. There is no intended change in regulatory effect.

Section: 1113A.6 Handrails. (New)

Rationale: HCD proposes to adopt the above referenced section. Section 1113A.6 is a new requirement, mandating compliance with Section 1114A.6 for handrails not required, but installed along walking surfaces. The proposed amendment is a result of comments received from stakeholders seeking clarification whether handrails installed voluntarily along walking surfaces shall comply with Chapter 11A. The proposed language refers to Section 1114A.6, which provides measures for handrails installed on ramps.

The newly proposed section provides clarity and consistency with Section 11B-403.6, which incorporates language from the 2010 ADA.

**8. SECTION 1114A
EXTERIOR RAMPS AND LANDINGS ON ACCESSIBLE ROUTES**

Section: 1114A.1 Width.

Rationale: HCD proposes to amend the above referenced section. The amendment is intended to continue maintaining the same technical requirements for common use areas and public use areas, and incorporates language from the 2010 ADA and Chapter 11B. HCD also proposes to reformat this section, providing more clarity to the code user.

Ramp width is addressed in multiple sections in Chapter 10 – Section 1005 Egress width, Section 1010.5.1 Width of ramps, Section 1018.2 Corridor width, etc. The text in Section 1114A.1 is not accurate, directing code users to requirements for exits only.

Item 1 of Section 1114A.1 is proposed for repeal because it provides unnecessary duplicative language. Section 1114A.1 refers to Chapter 10, and when the ramp width is calculated following the requirements in Section 1005.1, it will result in 60 inches clear width ($300 \times 0.2 = 60$).

HCD proposes the language, currently in Item 2, to be part of the newly proposed exception. Item 3, similarly, appears in the amended first paragraph of Section 1114A.1.

The only regulatory change is the repeal of Item 4. Currently Section 1114A.1, Item 4, does not allow handrails to project into the required clear width of ramps. The newly proposed second paragraph of this section is a new requirement, which, if adopted, will allow handrails to project into the required clear width. This amendment is consistent with Section 11B-405.5.

Section: 1114A.2.1 Cross slope.

Rationale: HCD proposes to amend the above referenced section for consistency with the model code and all other sections in Chapter 11A. HCD proposes to replace “inches per foot” with “units vertical in units horizontal” for measuring the allowable slope. There is no intended change in regulatory effect.

Section: 1114A.4.3 Size of bottom and intermediate landings. (Formerly “Landing width”)

Rationale: HCD proposes to amend the above referenced section. The proposed modification originates from existing Sections 1114A.4.7 and 1114A.4.6, and is intended to combine the requirements for bottom and intermediate landings. This amendment is a result of comments received from stakeholders expressing concerns that Section 1114A.4.6 is titled “Change of direction”, but contains requirements for bottom landings. There is no intended change in regulatory effect.

Section: 1114A.4.5 Strike edge extension.

Rationale: HCD proposes to amend the above referenced section for consistency with the 2010 ADA and Section 11B-405.7.5. HCD also proposes to replace the term, “maneuvering space” with “maneuvering clearance” because this is the term used in Section 1126A and other parts of Chapter 11A. There is no intended change in regulatory effect.

Section: 1114A.4.6 Change of direction.
Section: 1114A.4.7 Other intermediate landings.

Rationale: HCD proposes to amend Section 1114A.4.6 and repeal Section 1114A.4.7. The proposed language in the first paragraph of Section 1114A.4.6 is relocated from Section 1114A.4.7 and clarifies the size of intermediate landings at any change of direction. The second paragraph is the existing language, which provides for the change of direction in excess of 30 degrees. The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1114A.6.1 Where required.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal the last sentence of this section. The sentence is no longer necessary since newly proposed Section 1114A.6.2.2 addresses handrail continuity. There is no intended change in regulatory effect.

Section: 1114A.6.2.2 Handrail continuity. (Formerly “Handrail ends”)

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal the existing language, including the title, because the handrail ends are covered in Section 1114A.6.2.3. HCD proposes to incorporate language consistent with Section 11B-505.3, addressing handrail continuity. The new amendment provides clarity and consistency, and does not impose a new requirement because it is already addressed in Section 1012.

Section: 1114A.6.2.3 Handrail extensions.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to incorporate language consistent with Section 11B-505.10 and the 2010 ADA. Additional editorial modifications are made for more clarity. There is no intended change in regulatory effect.

Section: 1114A.6.2.4 Handrail projections.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal the last sentence, currently addressing reduction of the required clear width. The sentence is no longer needed since newly proposed language in Section 1114A.1 allows handrails to reduce the required clear width.

HCD also proposes to add “minimum” in the first sentence of this section. Currently, the required projection is 1 ½ inches fixed dimension. However, the 2010 ADA, ANSI A117.1 and Chapter 11B require 1 ½ inches minimum. This issue was discussed during the Building Standards Commission meeting in January 2013, when the Chapter 11A package for 2013 CBC was approved. The Commission recommended HCD make this dimension consistent with the federal standards and Chapter 11B.

Section: 1114A.6.2.5 Handrail grips. (Repealed)

Rationale: HCD proposes to repeal the above referenced section, reformat, amend and reprint the requirements for handrail grips. The newly proposed regulations (see Sections 1114A.6.2.5, 1114A.6.2.6 and 1114A.6.2.7 below) contain existing language and incorporate language from the 2010 ADA and Chapter 11B. Only the Note, which provided a reference to Chapter 11B for public housing, is not being brought forward into newly proposed Sections 1114A.6.2.5, 1114A.6.2.6 and 1114A.6.2.7 because the same Note is repeated in 10 other sections in Chapter 11A.

Section: 1114A.6.2.5 Handrail gripping surfaces. (New)

Rationale: HCD proposes to adopt the above referenced section. This new section contains existing language and incorporates language from the 2010 ADA and Chapter 11B. The new section provides clarity and consistency to the code user.

Section: 1114A.6.2.6 Cross section. (New)

Rationale: HCD proposes to adopt the above referenced section. This new section contains existing language and incorporates language from the 2010 ADA and Chapter 11B. The new proposal provides another option for handrail gripping surface. Since the existing language allows equivalent gripping surfaces, the new option is not intended to change the regulatory effect.

Rationale: HCD proposes to adopt the above referenced section. Currently the same language is contained in existing Section 1114A.6.2.5, which HCD proposes to repeal. The new section provides clarity and consistency with Chapter 11B. There is no intended change in regulatory effect.

Rationale: HCD proposes to repeal the above referenced section, reformat, amend and reprint the requirements for handrail grips. The newly proposed regulations (see Sections 1115A.6.2.5, 1115A.6.2.6 and 1115A.6.2.7 below) contain existing language, and incorporate language from the 2010 ADA and Chapter 11B. Only the Note, which provided a reference to Chapter 11B for public housing, is not being brought forward into newly proposed Sections 1115A.6.2.5, 1115A.6.2.6 and 1115A.6.2.7 because the same Note is repeated in 10 other sections in Chapter 11A.

Section: 1115.6.2.5 Handrail gripping surfaces. (New)

Rationale: HCD proposes to adopt the above referenced section. The proposed Section 1114A.6.2.5 contains existing language and incorporates language from the 2010 ADA and Chapter 11B. The new section provides clarity and consistency to the code user.

Section: 1115A.6.2.6 Cross section. (New)

Rationale: HCD proposes to adopt the above referenced section. This new section contains existing language and incorporates language from the 2010 ADA and Chapter 11B. The new proposal provides another option for handrail gripping surface. Since the existing language allows equivalent gripping surfaces, the new option is not intended to change the regulatory effect.

Section: 1115A.6.2.7 Fittings. (New)

Rationale: HCD proposes to adopt the above referenced section. Currently, the same language is contained in existing Section 1115A.6.2.5, which HCD proposes to repeal. The new section provides clarity and consistency with Chapter 11B. There is no intended change in regulatory effect.

**10. SECTION 1116A
HAZARDS ON ACCESSIBLE ROUTES**

Section: 1116A.2 Headroom clearance.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal “nominal” from the text because it conflicts with the general requirement for door height in Section 1126A as well as the general requirement in Section 1116A.2. These two sections require height of 80 inches minimum, not 80 inches nominal.

HCD also proposes to add language clarifying that Section 1126A contains measures for doors, not for doorways and archways less than 24 inches in depth. There is no intended change in regulatory effect.

Section: 1116A.3 Overhanging obstructions.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to adopt a new exception allowing door closers and door stops to be 78 inches minimum above the floor. The proposed amendment provides clarity and consistency with Sections 1003.3.1, 1008.1.1.1 and 11B-307.4.

Section: 1116A.5 Detectable warnings at hazardous vehicular areas.

Rationale: HCD proposes to adopt the above referenced section. The proposed language is a result of comments received from stakeholders expressing concerns that detectable warnings at hazardous vehicular areas are not addressed in Chapter 11A. This new proposal is consistent with Chapter 11B.

**11. SECTION 1117A
GENERAL REQUIREMENTS FOR ACCESSIBLE ENTRANCES, EXITS, INTERIOR ROUTES OF
TRAVEL AND FACILITY ACCESSIBILITY**

Section: 1117A.2 Primary entrances and exterior exit doors.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to add two exceptions, providing clarity and specificity for the exits not required to comply with Section 1117A.2. The newly proposed language is consistent with Section 11B-206.4.1.

Section: 1117A.5 Entrances from parking structures, tunnels or elevated walkways.

Rationale: HCD proposes to adopt the above referenced section. Currently, Chapter 11A requires all primary entrances and exterior ground floor exit doors to be accessible (with two exceptions). However, entrances from parking structures, tunnels or elevated walkways are not addressed. HCD proposes to incorporate language

from the 2010 ADA and Chapter 11B, providing clarity and specificity to the code user. Newly proposed Section 1117A.5 is consistent with Sections 11B-206.4.2 and 11B-206.4.3.

12. SECTION 1119A

INTERIOR ACCESSIBLE ROUTES (FORMERLY INTERIOR ROUTES OF TRAVEL)

Rationale: HCD proposes to change the title of Section 1119A, replacing “Interior routes of travel” with “Interior accessible routes.” HCD intends to provide more clarity since Section 1119A contains requirements for interior accessible routes, not interior routes of travel. In addition, some stakeholders expressed a concern that “Interior route of travel” is not defined in Chapter 11A, and as used here and in other sections of Chapter 11A. There is no intended change in regulatory effect.

Section: 1119A.1 General.

Rationale: HCD proposes to amend the above referenced section. HCD proposes an editorial modification, providing more clarity to the code user. There is no intended change in regulatory effect.

Section: 1119A.2 Floor and ground surfaces. (Formerly “Flooring”)

Rationale: HCD proposes to amend the above referenced section. HCD proposes to modify the title, replacing “Flooring” with “Floor and ground surfaces.” This amendment is a result of comments received from stakeholders. The term “Surfaces” more accurately describes the intent of this section. This modification provides consistency with the terminology used in Chapter 11B and Section 1110A.2. There is no intended change in regulatory effect.

Section: 1119A.3 Widths.

Section: 1119A.4 Interior accessible routes over 200 feet.

Section: 1119A.5 Changes in elevation.

Rationale: HCD proposes to adopt the above referenced sections. All three sections contain language currently in Section 1120A, which HCD proposes to repeal.

Although with different titles, existing Sections 1119A and 1120A contain requirements for interior accessible routes. HCD believes that there is no necessity for measures addressing the same subject to be maintained in two sections. As a result, HCD proposes to rename Section 1119A to “Interior accessible route,” repeal the language in Section 1120A, and combine the requirements for interior route of travel in Section 1119A. The proposed amendment provides clarity and consistency with other sections of Chapter 11A. There is no intended change in regulatory effect.

13. SECTION 1120A

RESERVED (FORMERLY INTERIOR ACCESSIBLE ROUTES)

Section: 1120A.1 Widths

Section: 1120A.2 Interior accessible routes over 200 feet.

Section: 1120A.3 Changes in elevation.

Rationale: HCD proposes to repeal the above referenced sections, and relocate the requirements for interior accessible routes to Section 1119A. There is no intended change in regulatory effect. (See rationale for Section 1119A.)

14. SECTION 1122A

INTERIOR RAMPS AND LANDINGS ON ACCESSIBLE ROUTES

Section: 1122A.1 Width.

Rationale: HCD proposes to amend the above referenced section. The amendment is intended to continue maintaining the same technical requirements for common use areas and public use areas, and incorporates language from the 2010 ADA and Chapter 11B. HCD also proposes to reformat this section, providing more

clarity to the code user.

Ramp width is addressed in multiple sections in Chapter 10 – Section 1005 Egress width, Section 1010.5.1 Width of ramps, and Section 1018.2 Corridor width, etc. The text in Section 1114A.1 is not accurate, directing code users to requirements for exits only.

Item 1 of Section 1122A.1 is proposed for repeal because it provides unnecessary duplicative language. Section 1122A.1 refers to Chapter 10, and when the ramp width is calculated following the requirements in Section 1005.1, it will result in 60 inches clear width ($300 \times 0.2 = 60$ ”).

HCD proposes the language, currently in Item 2, to be part of the newly proposed exception. Item 3, similarly, appears in the amended first paragraph of Section 1122A.1.

The only regulatory change in this section is the repeal of Item 4. Currently, Section 1122A.1, Item 4, does not allow handrails to project into the required clear width of ramps. The newly proposed second paragraph of this section is a new requirement, which, if adopted, will allow handrails to project into the required clear width. This amendment is consistent with Section 11B-405.5.

Section: 1122A.2.1 Cross slope.

Rationale: HCD proposes to amend the above referenced section for consistency with the model code and all other sections in Chapter 11A. HCD proposes to replace “inches per foot” with “units vertical in units horizontal” for measuring the allowable slope. The proposed modification provides clarity and consistency. There is no intended change in regulatory effect.

Section: 1122A.3 Landings.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to add a reference to Figure 11A-6C. The proposed amendment provides clarity and consistency with Section 1114A.4. There is no intended change in regulatory effect.

Section: 1122A.3.3 Size of bottom and intermediate landings (Formerly “Landing width”)

Rationale: HCD proposes to adopt the above referenced section with amendment. The proposed modification originates from the existing Sections 1122A.3.6 and 1122A.3.7 and is intended to combine the requirements for bottom and intermediate landings. This amendment is a result of comments received from stakeholders expressing concerns that Section 1122A.3.6 is titled “Change of direction”, but contains requirements for bottom landings. The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1122A.3.5 Strike edge extension.

Rationale: HCD proposes to adopt the above referenced section with amendment. The proposed amendment provides consistency with the 2010 ADA and Section 11B-405.7.5. HCD also proposes to replace the term “maneuvering space” with “maneuvering clearance” because this is the term used in Section 1126A and other parts of Chapter 11A. There is no intended change in regulatory effect.

Section: 1122A.3.6 Change of direction.

Section: 1122A.3.7 Other intermediate landings. (Repealed)

Rationale: HCD proposes to amend Section 1122A.3.6 and repeal Section 1122A.3.7. The proposed language in the first paragraph of Section 1122A.3.6 is relocated from Section 1122A.3.7, and clarifies the size of intermediate landings at any change of direction. The second paragraph is the existing language, which provides for the change of direction in excess of 30 degrees. The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1122A.5.1. Ramp handrails.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal the last sentence of this section. This sentence is no longer necessary since the newly proposed Section 1122A.5.2.2 addresses handrail continuity. There is no intended change in regulatory effect.

Section: 1122A.5.2.2 Handrail continuity. (Formerly “Handrail ends”)

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal existing language, including the title, because the handrail ends are covered in Section 1122A.5.2.3. HCD proposes to incorporate language consistent with Section 11B-505.3, addressing handrail continuity. The new amendment provides clarity and consistency, and does not impose a new requirement because it is already addressed in Section 1012.

Section: 1122A.5.2.3 Handrail extensions.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to incorporate language consistent with Section 11B-505.10 and the 2010 ADA. Additional editorial modifications are also made for more clarity. There is no intended change in regulatory effect.

Section: 1122A.5.2.4 Handrail projections.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal the last sentence, currently addressing the reduction of the required clear width of ramps. The sentence is no longer needed because the proposed language in Section 1122A.1 allows handrails to reduce the required clear width.

HCD also proposes to add “minimum” in the first sentence of this section. Currently the required projection is 1 ½ inches fixed dimension. However, the 2010 ADA, ANSI A117.1 and Chapter 11B require 1 ½ inches minimum. This issue was discussed during the Building Standards Commission meeting in January when the Chapter 11A package for 2013 CBC was approved. The commission recommended HCD make this dimension consistent with the federal standards and Chapter 11B.

Section: 1122A.5.2.5 Handrail grips. (Repealed)

Rationale: HCD proposes to repeal the above referenced section, reformat, amend and reprint the requirements for handrail grips. The proposed regulations (see Section 1122A.5.2.5, Section 1122A.5.2.6 and Section 1122A.5.2.7 below) contain existing language, and incorporate language from the 2010 ADA and Chapter 11B. Only the Note, which provided a reference to Chapter 11B for public housing, is not being brought forward into newly proposed Sections 1122A.5.2.5, 1122A.5.2.6 and 1122A.5.2.7 because the same Note is repeated in 10 other sections in Chapter 11A.

Section: 1122A.5.2.5 Handrail gripping surfaces. (New)

Rationale: HCD proposes to adopt the above referenced section. The newly proposed Section 1122A.5.2.5 contains existing language and incorporates language from the 2010 ADA and Chapter 11B. The new section provides clarity and consistency to the code user.

Section: 1122A.5.2.6 Cross section. (New)

Rationale: HCD proposes to adopt the above referenced section. The proposed section contains existing language and incorporates language from the 2010 ADA and Chapter 11B. The new proposal provides another option for handrail gripping surface. Since the existing language allows equivalent gripping surfaces, the new option is not intended to change the regulatory effect.

Section: 1122A.5.2.7 Fittings. (New)

Rationale: HCD proposes to adopt the above referenced section. Currently, the same language is contained in the existing Section 1122A.5.2.5, which HCD proposes to be repealed. The new section provides clarity and consistency with Chapter 11B. There is no intended change in regulatory effect.

Section: 1123A.6.2.7 Fittings. (New)

Rationale: HCD proposes to adopt the above referenced section. Currently, the same language is contained in existing Section 1123A.6.2.5, which HCD proposes to repeal. The new section provides clarity and consistency with Chapter 11B. There is no intended change in regulatory effect.

**16. SECTION 1124A
ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS**

Rationale: HCD proposes to amend Section 1124A. HCD proposes to modify the existing language, incorporating language from the 2010 ADA and Chapter 11B. HCD's intent is to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible.

HCD did not repeal existing measures in Section 1124A that did not conflict with newly proposed language. However, some existing language is proposed for repeal, and new sections are proposed for adoption, where HCD was unable to incorporate new Chapter 11B or the 2010 ADA language within the existing format of this section. Additional editorial corrections are also proposed for clarity.

The process of incorporating ADA language into Chapter 11A began during the 2012 Triennial Code Adoption Cycle. During this intervening code adoption cycle, HCD continues to modify sections that were left untouched during the previous rulemaking. The proposed amendment provides clarity and consistency with Chapter 11B, the 2010 ADA and 2009 ANSI A117.1.

**17. SECTION 1125A
HAZARD ON ACCESSIBLE ROUTES**

Section: 1125A.2 Headroom clearance.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal "nominal" from the text because it conflicts with the general requirement for door height in Section 1126A, as well as the general requirement in Section 1125A.2. These two sections require height of 80 inches minimum, not 80 inches nominal.

HCD also proposes to add language clarifying that Section 1126A contains measures for doors, not for doorways and archways less than 24 inches in depth.

Section: 1125A.3 Overhanging obstructions.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to adopt a new exception allowing door closers and door stops to be 78 inches minimum above the floor. The proposed amendment provides clarity and consistency with Sections 1003.3.1, 1008.1.1.1 and 11B-307.4.

**18. SECTION 1126A
DOORS AND WINDOWS**

Rationale: HCD proposes to amend Section 1126A. HCD proposes to modify the existing language, incorporating language from the 2010 ADA and Chapter 11B. HCD intends to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible.

HCD did not repeal existing measures in Section 1126A that did not conflict with newly proposed language. However, some existing language is proposed for repeal, and new sections are proposed for adoption, where HCD was unable to incorporate new Chapter 11B or the 2010 ADA language within the existing format of this section. Additional editorial corrections are also proposed for clarity. Sections proposed to be amended for reasons different from consistency with Chapter 11B are discussed below.

The process of incorporating ADA language into Chapter 11A began during the 2012 Triennial Code Adoption Cycle. During this intervening code adoption cycle, HCD continues to modify sections that were left untouched

during the previous rulemaking. The proposed amendment provides clarity and consistency with Chapter 11B, the 2010 ADA and 2009 ANSI A117.1.

Section: 1126A.1 Width and height of doors.

Rationale: HCD proposes to amend the above referenced section. The amendment of Item 1 is a result of comments received from stakeholders and clarifies that a clear opening of 32 inches minimum is required. Item 5 is proposed to be amended for consistency with Chapter 11A. An editorial modification of Item 2 is also proposed. There is no intended change in regulatory effect.

Section: 1126A.3.2.1 (Note)

Rationale: HCD proposes to amend the above referenced section. HCD proposes to modify the existing language, incorporating language from the 2010 ADA and Chapter 11B. HCD intends to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible.

HCD also proposes to adopt a note below Item 4. The newly proposed note clarifies that the requirements for maneuvering clearances at primary entry doors and all required exit doors to covered multifamily dwellings are contained in Section 1132A. There is no intended change in regulatory effect.

Section: 1126A.8 Windows.

Rationale: HCD proposes to adopt the above referenced section, providing language for windows in common use areas required to be accessible. HCD also proposes to modify the title of Section 1126A “Doors” to “Doors and windows” to correlate with the proposed new language.

FHA Guidelines and FHADM require operable windows in common use areas, intended for use by the residents, to be accessible to meet the requirements of 1986 ANSI A117.1. Currently, Chapter 11A does not specifically address accessible windows in common use areas. However, Section 1138A.4 contains provisions for controls and operating mechanisms, and Section 1138A.3 contains provisions for reach ranges. Although not specifically stated, these two sections cover the operating mechanisms of windows. Therefore, HCD believes that windows are currently required to be accessible.

Regardless of these provisions, multiple stakeholders expressed a concern that Chapter 11A does not address windows. To provide more clarity and specificity, HCD proposes to adopt language addressing the windows in common use areas. The proposed language is consistent with the 2010 ADA, Chapter 11B, and ANSI A117.1. There is no intended change in regulatory effect.

**19. SECTION 1127A
COMMON USE FACILITIES**

**Section: 1127A.2.1 Multiple-accommodation toilet facilities
Item 5 Compartment doors.**

Rationale: HCD proposes to amend Section 1127A.2.1, Item 5. HCD proposes to add a reference to Section 1126A, which clarifies that compliance with Section 1126A is also required.

Currently, compartment doors are required to comply with Section 1126A. However, many code users and enforcing agencies requested HCD to clarify in the text whether compartment doors shall comply with Section 1126A. The proposed modification also provides consistency with Section 11B-604.8.2.1.

In addition, HCD proposes to adopt Item 5.5 for clarity and consistency with Section 11B-604.8.1.2.

**Section: 1127A.3 Accessible lavatories.
Item 5 Plumbing protection.**

Rationale: HCD proposes to amend Item 5 of the above referenced section. Modification is necessary to correct an oversight.

During the 2012 Triennial Code Adoption Cycle, HCD amended Section 1127A for consistency with the 2010 ADA and Chapter 11B. HCD intended to repeal the term “accessible” and it was shown in the Final Express Terms where the proposed language for Item 5 did not contain “accessible.” However, HCD unintentionally did not show “accessible” in strikeout, which is contrary to the requirement that repealed text should be shown in strikeout. As a result, during the proofing, HCD added “accessible” in the text. HCD proposes to correct this oversight and repeal “accessible” from the text as originally planned. There is no intended change in regulatory effect.

Section: 1127A.13 Electric vehicle charging spaces. (Reserved)

Rationale: HCD proposes to adopt the above referenced section. This section addresses electric vehicle charging stations, but it is only a placeholder and starting point for discussion.

HCD is aware that the Division of the State Architect (DSA) is developing guidelines (**Plug-In Electric Vehicles: Universal Charging Access Guidelines and Best Practices**) to assist the Governor’s Office of Planning and Research with physical accessibility standards and design guidelines for the installation of plug-in electric vehicle charging stations throughout California. These guidelines are based on the 2010 ADA standards. A draft of these guidelines has been posted on the Governor’s Office of Planning and Research website.

HCD is also aware that the DSA is continuing its effort, in conjunction with many stakeholders and other state agencies, to improve the draft. However, at this stage, HCD is not aware of any final product that can be used in Chapter 11A.

**20. SECTION 1131A
CHANGES IN LEVEL ON ACCESSIBLE ROUTES**

Section: 1131A.2 Changes greater than ½ inch.

Rationale: HCD proposes to amend the above referenced section. The proposed amendment incorporates language clarifying that sloped surface is an appropriate method of compliance with Section 1131A.2. The proposed amendment provides clarity and consistency with Sections 1111A.2 and 1121A.2. There is no intended change in regulatory effect.

**21. SECTION 1132A
DOORS**

Section: 1132A.3 Width and height of interior doors and secondary exterior doors.

Rationale: HCD proposes to amend Item 2 of Section 1132A.3. The proposed amendment allows the installation of any width if the requirement for 32 inches clear door opening is met. This clarification is a result of comments received from stakeholders expressing concerns that the allowance of a 34-inch wide door creates the illusion that the 32-inch clear opening is not required.

HCD believes that the language, as written, is sufficiently clear and describes the intent. However, HCD agrees to provide clarification and avoid the confusion among some code users. There is no intended change in regulatory effect.

**Section: 1132A.5 Maneuvering clearance at doors.
1132A.5.1 General.**

Rationale: HCD proposes to amend Section 1132A.5.1. HCD proposes to repeal Exception 2, and relocate the same language as the first paragraph of this section. HCD also proposes to modify Exception 1, clarifying its application (applicable to interior doors). HCD believes that the existing Exception 2 is not an exception, but the general requirement for maneuvering clearances at doors. The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1132A.9 Smooth surface.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal existing language, addressing the smooth surfaces required for the bottom 10 inches of a door, and replace it with new language consistent with Section 11B-404.2.10. HCD also proposes to amend the existing exception and add two new exceptions consistent with Section 11B-404.2.10.

Section 1132A.9, as written, requires smooth uninterrupted surface on the bottom 10", both sides. In comparison, Section 11B-404.2.10 clarifies that 10" are measured from finish floor, not from the bottom of the door, and are required on push side only. Section 1132A.9 also requires all doors and/or gates to have a smooth, uninterrupted surface; however, this section does not specify how big this surface should be. In comparison, Section 11B-404.2.10 clarifies the area – the full width of the door.

HCD took all concerns into consideration and proposes to modify this section for consistency with Section 1126A and Section 11B-404.2.10.

**22. SECTION 1133A
KITCHENS**

Section: 1133A.2 Clear floor space.

Section: 1133A.3 Removable base cabinets.

Rationale: HCD proposes to amend the above referenced sections. HCD proposes to replace existing language with new language that more accurately describes the intent. The proposed modification clarifies that the requirements for parallel and forward approach, knee and toe space, removable base cabinets, and repositionable countertops (see Section 1133A.4.1) apply to kitchen sinks and work surfaces. Stakeholders and other code users expressed a concern that currently the language, as written, is not as clear because it seems that the removable base cabinets are required under work surfaces only when repositionable countertops are required.

The Development of Chapter 11A and many of its current provisions date back to the 1986 ANSI A117.1; this was the primary document that HCD utilized. In some areas, HCD has promulgated more stringent requirements. The requirement for removable base cabinets under work surfaces is from ANSI A117.1 1986, Section 4.32.5.4. This is where and why HCD has consistently determined the provisions were also intended as a Chapter 11A requirement. However, some stakeholders successfully pointed out that HCD's language is not as clear.

HCD regulations went further than ANSI 1986 by also requiring removable base cabinets under the kitchen sink (1986 ANSI A117.1 only requires removable base cabinets at sinks in a U-shaped kitchen configuration). Therefore, HCD believes the intent has been (and continues to be) to require removable base cabinets under work areas, no different from that of the 1986 ANSI A117.1.

The proposed amendments in Sections 1133A.2 and 1133A.3 provide clarity and consistency to the code user. There is no intended change in regulatory effect.

Section: 1133A.4 Countertops.

Rationale: HCD proposes to amend the above referenced section by deleting the reference to Section 1133A.4.1. HCD believes that this sentence is not necessary since Section 1133A.4.1 is a subsection of Section 1134A.4, and follows the exception. It would be necessary if it were in a different chapter or division. Additional editorial corrections are also proposed for clarity. There is no intended change in regulatory effect.

Section: 1133A.4.1 Repositionable countertops.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to replace the terms “kitchen sink and work surface space” and “kitchen sink counter area and work surface” with “sinks and work surfaces.” This modification is a result of comments received from stakeholders expressing a concern that the use of different terms in the same section creates confusion. HCD proposes “Sinks and work surfaces” as a better combination of terms to be used in Section 1133A. HCD also proposes to amend Exception 2, clarifying that the repositioning is not required for breadboards used in lieu of countertop work surfaces.

The proposed modification of Section 1133A.4 provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1133A.7. Knee and toe space.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal existing language addressing size of knee and toe spaces, and instead refer to Section 1138A.2. Section 1138A.2 was adopted during the 2012 Triennial Code Adoption Cycle; it contains the technical requirements for knee and toe spaces. The proposed amendment is consistent with Section 1127A.3, which also was amended during the 2012 Triennial Code Adoption Cycle.

Currently, five sections in Chapter 11A provide different language addressing knee and toe space. HCD intends to make all sections consistent by referring to Section 1138A.2 for the technical requirements and leaving only specific details in these five sections. The proposed amendment provides clarity. There is no intended change in regulatory effect.

Section: 1133A.7.1 Plumbing protection.

Rationale: HCD proposes to amend the above referenced section, providing consistency with Section 1127A.3. There is no intended change in regulatory effect.

**23. SECTION 1134A
BATHING AND TOILET FACILITIES****Section: 1134A.5 Bathtubs.**

Rationale: HCD proposes to amend Item 1 of the above referenced section. The proposed amendment incorporates language from the FHADM, and clarifies the location of bathtub controls and the required clear floor space. There is no intended change in regulatory effect.

Section: 1134A.7 Water closets.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to modify Item 1, clarifying that the location of water closets shall permit a grab bar installation on at least one side of the fixture. The proposed amendment provides clarity and is based on comments received from stakeholders. There is no intended change in regulatory effect.

Section: 1134A.8 Lavatories, vanities, mirrors and towel fixtures.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal existing language in Item 4, adopt new language addressing the relationship between knee and toe space and clear floor space, and refer to Section 1138A.2. Section 1138A.2 was adopted during the 2012 Triennial Code Adoption Cycle; it contains the technical requirements for knee and toe spaces. Currently, five sections in Chapter 11A provide different language addressing knee and toe space. HCD’s intent is to make all sections consistent, referring to Section 1138A.2 for the technical requirements, and leaving only specific details in these five sections.

HCD also proposes to amend Item 6 by incorporating language from Section 1127A.3 “Accessible lavatories”. HCD amended Section 1127A.3 during the 2012 Triennial Code Adoption Cycle to incorporate language from the 2010 ADA and Chapter 11B. HCD does not have to necessarily adopt ADA provisions for dwelling units. However, HCD believes that there are measures which have to be the same regardless of the areas they apply to (common use areas or dwelling units).

The proposed amendment provides clarity and consistency. There is no intended change in regulatory effect.

24. SECTION 1136A
ELECTRICAL RECEPTACLE, SWITCH AND CONTROL HEIGHTS (No change to text)

25. SECTION 1138A
SPACE ALLOWANCES AND REACH RANGES

Section: 1138A.3.2 Side reach.

Rationale: HCD proposes to amend the above referenced section. The new amendment clarifies that the kitchen countertops in dwelling units are exempt from the height requirements when the side reach is over an obstruction.

During the 2012 Triennial Code Adoption Cycle, HCD combined all measures for reach ranges in Section 1138A.3. In the 2013 CBC, Section 1138A.3.2 (Item 2) requires 34” maximum height of an obstruction when the side reach is over an obstruction. The exception exempts the top of washing machines and clothes dryers, but not kitchen countertops in dwelling units. Currently, Chapter 11A allows 36” high kitchen countertops in dwelling units, and HCD never intended to change this requirement. However, Sections 1133A and 1136A refer to Section 1138A.3 for compliance with the reach ranges requirements in the dwelling units, and it creates confusion that the maximum height allowed for kitchen countertops is 34 inches. HCD proposes to correct this oversight by amending the exception of Section 1138A.3.2. There is no intended change in regulatory effect.

26. SECTION 1140A
ACCESSIBLE TELEPHONES

Rationale: HCD proposes to amend Section 1140A. HCD proposes to modify the existing language, incorporating language from the 2010 ADA and Chapter 11B. HCD intends to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible.

HCD did not repeal existing measures in Section 1140A that did not conflict with newly proposed language. However, some existing language is proposed for repeal, and new sections are proposed for adoption, where HCD was unable to incorporate new Chapter 11B or the 2010 ADA language within the existing format of this section. Additional editorial corrections are also proposed for clarity. Sections proposed to be amended for reasons different from consistency with Chapter 11B are discussed below.

The process of incorporating ADA language into Chapter 11A began during the 2012 Triennial Code Adoption Cycle. During the current intervening code adoption cycle, HCD continues to modify sections that were left untouched during the previous rulemaking. The proposed amendment provides clarity and consistency with Chapter 11B, the 2010 ADA, and 2009 ANSI A117.1.

Section: 1140A.2 Clear floor or ground space.

Section: 1140A.3 Relationship of maneuvering clearances to wheelchair spaces.

Rationale: HCD proposes to amend the above referenced sections. HCD proposes to repeal existing language, and to provide references to Section 1138A.1.4. In 2013 CBC, all requirements for clear floor space are combined in Section 1138A.1.4. The measures covered in Sections 1140A.2 and 1140A.3 duplicate the language seen in Section 1138A.4.1. There is no intended change in regulatory effect.

Section: 1140A.4 Mounting height.

Rationale: HCD proposes to repeal the reference to Figure 11A-1B, and provide a reference to Section 1138A.3, which contains the requirements for reach ranges. In the previous rulemaking (2013 CBC), HCD decided to eliminate references to figures which were used to illustrate code requirements, but did not have supporting text within the body of Chapter 11A. HCD believes that the figures in the back of Chapter 11A are provided for illustration purposes only, and are not mandatory. Therefore, references to figures are replaced with new language or reference to sections, which address the specific requirements contained in the figures. There is no intended change in regulatory effect.

Section: 1140A.10 Telephone books.

Rationale: HCD proposes to repeal the reference to Figure 11A-1I and 11A-1J, and provide a reference to Section 1138A.3, which contains the requirements for reach ranges. In the previous rulemaking (2013 CBC), HCD decided to eliminate references to figures which were used to illustrate code requirements, but did not have supporting text within the body of Chapter 11A. HCD believes that the figures in the back of Chapter 11A are provided for illustration purposes only, and are not mandatory. Therefore, references to figures are replaced with new language or reference to sections, which address the specific requirements contained in the figures. There is no intended change in regulatory effect.

**27. SECTION 1141A
ACCESSIBLE SWIMMING POOLS**

Rationale: HCD proposes to amend Section 1141A. HCD proposes to modify the existing language, incorporating language from the 2010 ADA and Chapter 11B. HCD's intent is to continue maintaining the same technical requirements for common use areas and public use areas, wherever possible.

**28. SECTION 1143A
SIGNAGE**

Section: 1143A.6 Raised characters and pictorial symbol signs.

Rationale: HCD proposes to amend Item 8 of the above referenced section. This exception is proposed by the DSA in Chapter 11B, and is a result of comments received from stakeholders. HCD proposes to co-adopt this exception for consistency with Chapter 11B. HCD will continue to coordinate with the DSA; additional modifications to the 2013 CBC during the intervening code adoption cycle may be necessary.

Section: 1143A.8 Symbols of accessibility.

Rationale: HCD proposes to amend the above referenced section by repealing the requirement for specific color (federal blue). This proposal is consistent with the DSA proposal in Chapter 11B, and is a result of HCD's coordination with the DSA. The reason for this proposal is that the federal blue is difficult for enforcement. HCD will continue to monitor the DSA proposals; additional modifications of this section during the current intervening code adoption cycle may be necessary.

29. DIVISION VII – FIGURES

NOTE: Some changes in the language of Chapter 11A will affect the existing figures. HCD is currently working and will continue to work on the figures.

ESTIMATED COST OF COMPLIANCE, ESTIMATED POTENTIAL BENEFITS, AND RELATED ASSUMPTIONS USED FOR BUILDING STANDARDS THAT IMPACT HOUSING

(Government Code Section 11346.2(b)(6)(B) states if a proposed regulation that is a building standard impacts housing, the Initial Statement of Reasons shall include the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates.)

- No increased cost of compliance for those regulations that make technical, nonsubstantive or clarifying changes. It is anticipated that a reduction in costs may result from compliance with the building standards that align with existing Chapter 11B regulations. Increased cost of compliance for some regulations, such as detectable warnings; however, the benefit of eliminating hazardous conditions far outweighs the cost impact.
- Updated and improved minimum requirements necessary to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, stability, sanitation, accessibility, use and occupancy, adequate light and ventilation, energy conservation, and safety to life and property from fire and other hazards attributed to the built environment.
- Protection of public health and safety, worker safety and the environment.
- General welfare of California residents.

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

(Government Code Section 11346.2(b)(7) requires a department, board, or commission within the Environmental Protection Agency, the Resources Agency, or the Office of the State Fire Marshal to describe its efforts, in connection with a proposed rulemaking action, to avoid unnecessary duplication or conflicts with federal regulations contained in the Code of Federal Regulations addressing the same issues. These agencies may adopt regulations different from these federal regulations upon a finding of one or more of the following justifications: (A) The differing state regulations are authorized by law and/or (B) The cost of differing state regulations is justified by the benefit to human health, public safety, public welfare, or the environment.)

These regulations do not duplicate nor conflict with federal regulations.